

<input checked="checked" type="checkbox"/> FILED	<input type="checkbox"/> RECEIVED
<input type="checkbox"/> ENTERED	<input type="checkbox"/> SERVED ON
COUNSEL/PARTIES OF RECORD	
<b>MAR 25 2021</b>	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

CHRISTOPHER CHIOU  
Acting United States Attorney  
Nevada Bar No. 14853  
ANDOLYN JOHNSON  
Nevada Bar No. 14723  
Assistant United States Attorney  
400 South Virginia Street, Suite 900  
Reno, Nevada 89501  
(775) 784-5438  
[Andolyn.Johnson@usdoj.gov](mailto:Andolyn.Johnson@usdoj.gov)

*Attorneys for the United States*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JESSE AREVALO,  
aka "Kay," and  
FRANCISCO NAVARRO-DELGADO,

Defendants.

Case No.: **3:21-cr-00012-LRH-CLB**

CRIMINAL INDICTMENT

**VIOLATIONS:**

21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(B)(vi),  
and 841(b)(1)(C) – Conspiracy to Distribute  
Controlled Substances (Count One);

21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) –  
Possession with Intent to Distribute a  
Controlled Substance (Counts Two, Three,  
and Four);

21 U.S.C. §§ 856(a)(1) – Maintaining a Drug  
Involved Premises (Count Five);

THE GRAND JURY CHARGES THAT:

**COUNT ONE**

Conspiracy to Distribute Controlled Substances  
(21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(B)(vi), 841(b)(1)(C))

1. From a time unknown but no earlier than November 24, 2019, and continuing to  
and including on or about March 25, 2021, in the State and Federal District of Nevada,

1 JESSE AREVALO,  
2 aka "Kay," and  
3 FRANCISCO NAVARRO-DELGADO

4 defendants herein, and others known and unknown to the Grand Jury, knowingly combined,  
5 conspired, confederated, and agreed with each other to distribute 40 grams or more of a mixture  
6 and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]  
7 propenamide (fentanyl), a Schedule II controlled substance, cocaine, a Schedule II controlled  
8 substance, and heroin, a Schedule I controlled substance, all in violation of Title 21, United  
9 States Code, Sections 846, 841(a)(1) 841(b)(1)(B)(vi) and 841(b)(1)(C).

10 COUNT TWO  
11 Possession with Intent to Distribute a Controlled Substance  
12 (21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

13 2. From a time unknown but no earlier than November 24, 2019, and continuing to  
14 and including on or about March 25, 2021, in the State and Federal District of Nevada,

15 JESSE AREVALO,  
16 aka "Kay,"  
17 defendant herein, knowingly and intentionally possessed with intent to distribute a mixture and  
18 substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]  
19 propenamide (fentanyl), a Schedule II controlled substance, all in violation of Title 21, United  
20 States Code, Sections 841(a)(1) and 841(b)(1)(C).

21 COUNT THREE  
22 Possession with Intent to Distribute a Controlled Substance  
23 (21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

24 3. From a time unknown but no earlier than November 24, 2019, and continuing to  
and including on or about March 25, 2021, in the State and Federal District of Nevada,

JESSE AREVALO,  
aka "Kay,"

1 defendant herein, knowingly and intentionally possessed with intent to distribute a mixture and  
2 substance containing a detectable amount of cocaine, a Schedule II controlled substance, all in  
3 violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

4 COUNT FOUR

Possession with Intent to Distribute a Controlled Substance  
5 (21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

6 4. From a time unknown but no earlier than May 20, 2020, and continuing to and  
7 including on or about March 1, 2021, in the State and Federal District of Nevada,

8 JESSE AREVALO,  
9 aka "Kay,"

10 defendant herein, knowingly and intentionally possessed with intent to distribute a mixture and  
11 substance containing a detectable amount of heroin, a Schedule I controlled substance, all in  
12 violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

13 COUNT FIVE

Maintaining a Drug Involved Premises  
14 (21 U.S.C. §§ 856(a)(1))

15 5. From a time unknown but no earlier than November 24, 2019, and continuing to  
16 and including on or about March 1, 2021, in the State and Federal District of Nevada,

17 JESSE AREVALO,  
18 aka "Kay," and  
FRANCISCO NAVARRO-DELGADO,

19 defendants herein, knowingly and intentionally maintained a place for the purpose of  
20 distributing a controlled substance, all in violation of Title 21, United States Code, Section  
21 856(a)(1).

22 FORFEITURE ALLEGATION ONE

Conspiracy to Distribute Controlled Substances,  
23 Possession with Intent to Distribute a Controlled Substance, and  
24 Maintaining a Drug Involved Premises

1           1. The allegations of Counts 1 through 5 of this Criminal Indictment are hereby  
2 realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to  
3 18 U.S.C. § 924(d)(1) with 28 U.S.C. § 2461(c) and 21 U.S.C. § 853(a)(2).

4           2. Upon conviction of any of the felony offenses charged in Counts 1 through 5 of this  
5 Criminal Indictment,

6                                   JESSE AREVALO,  
7                                   aka "Kay," and  
8                                   FRANCISCO NAVARRO-DELGADO,

9           defendants herein, shall forfeit to the United States of America, any firearm or  
10 ammunition involved in or used in any violation of any other criminal law of the United States,  
11 21 U.S.C. §§ 841(a)(1), 846, and 856(a)(1):

12           defendants herein, shall forfeit to the United States of America, any property used, or  
13 intended to be used, in any manner or part, to commit, or to facilitate the commission of 21  
14 U.S.C. §§ 841(a)(1), 846, and 856(a)(1), 859(a):

- 15           1. an iphone with IMSI number 311480600101912;
- 16           2. a Mac-10 firearm with snake emblem and unknown serial number;
- 17           3. a Mac-10 extended magazine;
- 18           4. rounds loaded in the Mac-10 extended magazine;
- 19           5. a Glock 19 9mm caliber pistol with serial number YSZ609;
- 20           6. a 9mm extended magazine;
- 21           7. rounds loaded in the 9mm extended magazine; and
- 22           8. any and all compatible ammunition.

23           All pursuant to 18 U.S.C. § 924(d)(1) with 28 U.S.C. § 2461(c) and 21 U.S.C. §§  
24 841(a)(1), 846, and 856(a)(1).

FORFEITURE ALLEGATION TWO

Conspiracy to Distribute Controlled Substances,  
Possession with Intent to Distribute a Controlled Substance, and  
Maintaining a Drug Involved Premises

1. The allegations of Counts 1 through 5 of this Criminal Indictment are hereby  
realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to  
21 U.S.C. § 881(a)(11) with 28 U.S.C. § 2461(c).

2. Upon conviction of any of the felony offenses charged in Counts 1 through 5 of this  
Criminal Indictment,

JESSE AREVALO,  
aka "Kay," and  
FRANCISCO NAVARRO-DELGADO,

defendants herein, shall forfeit to the United States of America, any firearm used or  
intended to be used to facilitate the transportation, sale, receipt, possession, or concealment of  
property described in 21 U.S.C. § 881(a)(1) and 881(a)(2), in violation of 21 U.S.C. §§  
841(a)(1), 846, and 856(a)(1), and any proceeds traceable to such property:

1. a Mac-10 firearm with snake emblem and unknown serial number;
2. a Mac-10 extended magazine;
3. a Glock 19 9mm caliber pistol with serial number YSZ609; and
4. a 9mm extended magazine.

All pursuant to 21 U.S.C. §§ 841(a)(1), 846, and 856(a)(1), and 21 U.S.C. § 881(a)(11)  
with 28 U.S.C. § 2461(c).

///

///

///

///

FORFEITURE ALLEGATION THREE

Conspiracy to Distribute Controlled Substances,  
Possession with Intent to Distribute a Controlled Substance, and  
Maintaining a Drug Involved Premises

1. The allegations of Counts 1 through 5 of this Criminal Indictment are hereby  
realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to  
18 U.S.C. § 924(d)(1), (2)(C), and (3)(B) with 28 U.S.C. § 2461(c).

2. Upon conviction of any of the felony offenses charged in Counts 1 through 5 of this  
Criminal Indictment,

JESSE AREVALO,  
aka "Kay," and  
FRANCISCO NAVARRO-DELGADO,

defendants herein, shall forfeit to the United States of America, any firearm or  
ammunition intended to be used in any offense punishable under the Controlled Substances Act  
21 U.S.C. §§ 841(a)(1), 846, and 856(a)(1):

1. a Mac-10 firearm with snake emblem and unknown serial number;
2. a Mac-10 extended magazine;
3. rounds loaded in the Mac-10 extended magazine;
4. a Glock 19 9mm caliber pistol with serial number YSZ609;
5. a 9mm extended magazine;
6. rounds loaded in the 9mm extended magazine; and
7. any and all compatible ammunition.

///

///

///

///

1 All pursuant to 18 U.S.C. § 924(d)(1), (2)(C), and (3)(B) with 28 U.S.C. § 2461(c) and 21  
2 U.S.C. §§ 841(a)(1), 846, and 856(a)(1).

3 **DATED:** this 25 day of March, 2021.

4 **A TRUE BILL:**

5  
6   
FOREPERSON OF THE GRAND JURY

7 CHRISTOPHER CHIOU  
8 Acting United States Attorney

9   
10 ANDOLYN JOHNSON  
11 Assistant United States Attorney